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Attorneys for Defendant
WALMART INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

YIMI VALDOVINOS,

Plaintiff,

vs.

WALMART, INC.; AND DOES 1 THROUGH
50, INCLUSIVE,

Defendants.

Fed Case No. 2:20-CV-0222-KJM-DMC

**STIPULATION AND ORDER TO
CONTINUE LITIGATION DEADLINES**

Removal Date: January 29, 2020
Trial Date: TBD

IT IS HEREBY AGREED AND STIPULATED, by and between all parties, through their undersigned counsel, as to the following:

1. On January 29, 2020, Defendant Walmart, Inc. (“Defendant” or “Walmart”) filed its Notice to Court and Adverse Party of Removal to Federal Court.
2. The Court issued its Initial Pretrial Scheduling Order on April 2, 2020.
3. The parties subsequently have engaged in substantial discovery and stipulated to participate in the Court’s Voluntary Dispute Resolution Program. The Court continued all pretrial deadlines in accordance with a 114-day extension of the mediation deadline. This matter was ultimately mediated with neutral Sanford Kingsley on March 31, 2021 but did not resolve.
4. Plaintiff has since sent Defendant further written discovery, taken additional depositions, and conducted a site inspection of the Walmart facility that employed Plaintiff.

5. The parties have subsequently discussed and agreed to submit this matter to another session of mediation with a new mediator which the parties will be in the process of coordinating to occur within the next 60-90 days.
6. The current deadline to exchange RFCP 26 Expert Disclosures is October 7, 2021. No trial date has yet been assigned.
7. The parties believe that engaging in mediation prior to the parties expending considerable time and financial resources in retaining experts and conducting further discovery would result in a more meaningful mediation with the hopes of achieving a complete resolution of the lawsuit
8. In order to allow the parties the opportunity to engage in these settlement discussions prior to incurring the costs associated with completing non-expert discovery and retaining/disclosing expert witnesses, the parties request that all pretrial litigation deadlines be extended by 120 days.
9. The parties agree that it is in the best interests of all concerned that all pretrial deadlines in this matter be continued to allow the parties devote resources toward a potential resolution of this matter prior to trial.
10. Good cause exists for granting this request based on the foregoing.
11. This stipulation may be executed in counterparts and by facsimile or PDF signature.

Dated: September 2, 2021

Respectfully stipulated to and submitted by,

BOHM LAW GROUP INC

By: /s/
Lawrance A. Bohm, Esq.
Daniel T. Newman, Esq.
Scott C. Zienty, Esq.
Attorneys for Plaintiff
YIMI VALDOVINOS

1 Dated: September 2, 2021

PHILLIPS, SPALLAS & ANGSTADT LLP

2 By: /s/
3 Gregory L. Spallas, Esq.
4 Adolpho O. Karajah, Esq.
5 Attorneys for Defendant
6 WALMART INC.

7 **ORDER**

8 Pursuant to the *Parties' Stipulation to Continue Litigation Deadlines*, and good cause having
9 been shown, the current pretrial litigation deadlines in this matter are all continued for 120 days.

10 Dated: September 7, 2021

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12 DENNIS M. COTA
13 UNITED STATES MAGISTRATE JUDGE
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